

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

SAMUEL BANKMAN-FRIED,

Defendant.

S6 22 Cr. 673 (LAK)

ORAL ARGUMENT REQUESTED

NOTICE OF SAMUEL BANKMAN-FRIED'S MOTIONS *IN LIMINE*

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Christian R. Everdell with Exhibits and Memorandum of Law, Samuel Bankman-Fried hereby moves through his counsel as follows:

Motion *in Limine* No. 1: Motion to preclude the Government from introducing evidence that was produced to the defense after July 1.

Motion *in Limine* No. 2: Motion to exclude evidence of the FTX bankruptcy, the solvency of FTX and Alameda, and their ability to make customers whole.

Motion *in Limine* No. 3: Motion to exclude evidence of Mr. Bankman-Fried's resignation from FTX.

Motion *in Limine* No. 4: Motion to exclude statements that pertain to FTX.US.

Motion *in Limine* No. 5: Motion for an order directing the Government to produce immediately to the defense all orally communicated *Brady* material in its possession.

PLEASE TAKE FURTHER NOTICE that Mr. Bankman-Fried hereby reserves his rights to oppose to the Government's motions *in limine* to introduce evidence related to severed and

withdrawn counts and, to the extent the Government seeks to admit document metadata, to oppose the admissibility of such evidence.

Dated: August 14, 2023
New York, New York

Respectfully submitted,

/s/ Mark S. Cohen

Mark S. Cohen

Christian R. Everdell

Sri K. Kuehnlenz

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